



CITY OF ORANGE

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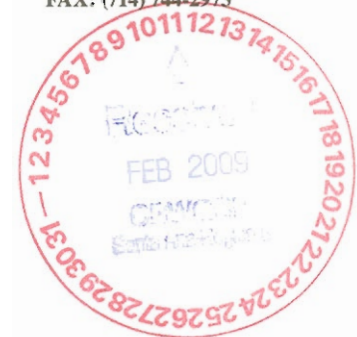
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February 10, 2009

Gerard J. Thibeault
Executive Officer
California Regional Water Quality Control Board Santa Ana Region
3737 Main St. Suite 500
Riverside, CA 92501- 3348



Subject: Renewal of Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and Incorporated Cities of Orange County, Tentative Draft Order R8-2008-0030, NPDES No. CAS618030, Areawide Urban Storm Water Runoff

Dear Mr. Thibeault:

As a permittee of the Orange County Areawide Urban Storm Water Runoff permit, the City of Orange would like to take the opportunity to comment on the proposed municipal storm water draft permit. The City appreciates the efforts undertaken by regional board staff to maintain programs that work and to modify or revise those program elements that need adjusting.

We are pleased that certain permit provisions of the existing permit have been maintained such as the iterative process to address program exceedances, continued coverage of public agency construction projects under the municipal permit, exemption of approved projects from the new LID requirements and other provisions.

This letter addresses some of the draft permit's provisions that are of concern to the City, which we believe can be resolved by working cooperatively with regional board staff. We also support the County of Orange's comments as the principal permittee whose letter addresses some of the larger policy issues.

One area that the City is particularly concerned about is the New Development/Significant Redevelopment section that adds significant new requirements for the approval of new projects. We recognize that there are ongoing discussions on this subject by a number of interested parties that include the principal permittee; however, our comments are based on the existing language in the proposed permit.

The draft permit contains new LID requirements that include limiting priority projects to 5% Effective Impervious Area. Redevelopment projects and new street widening projects that utilize existing impervious surface to expand will find compliance with the 5%EIA provision extremely difficult if not impossible to meet. The 5% EIA provision will be problematic and result in prohibitive costs for such projects.

We appreciate the alternative In-Lieu programs included in the draft permit but are not certain how this program will work. Consideration should be given to omitting the LID and 5% EIA requirements for these type of projects.

In addition, the Commercial Inspection section adds eleven new categories of facilities for inspection while arbitrarily mandating a certain percentage of facilities to be designated as High and Medium priorities. We estimate that these mandatory inspection requirements will add 50 more annual, 250 biennial and 900 more commercial inspections during the permit term. Compliance with this requirement will require additional new City resources and expenditures during a time of uncertain economic conditions.

There are also many other comments regarding the proposed permit's requirements that are more fully discussed in the attachment to this letter. We note that there are many increased administrative requirements for inspections in some of the existing and new programs that may be unwarranted and provide little benefit in the improvement of water quality. We also suggest that consideration be given to extending the time for implementing some of the new programs, in particular the new LID requirements until the concept is fully understood.

Sincerely,



Joe DeFrancesco
Interim Public Works Director

Attachment: Comments on Draft Municipal Storm Water Permit

cc: John Sibley, City Manager
Alice Angus, Director, Community Development
Chris Crompton, Manager, Environmental Resources County of Orange

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Comments on Draft Municipal Storm Water Permit

Following are comments on the draft Orange County Municipal Storm Water permit. Comments are arranged in the order in which the provisions are found in the permit. Along with an analysis of the provisions, recommendations are provided that contain suggested revisions (in bold) or clarification to permit language.

PERMIT PROVISIONS

Section VII – Illicit Discharge/Illegal Connection; Litter, Debris and Trash Control

Paragraph 5 requires permittees to characterize trash and determine its sources. Is the intent to require each permittee to carry out this requirement? It makes more sense to conduct a countywide study instead of having each municipality repeat the study since trash sources do not vary significantly among municipalities.

Recommendation:

Revise paragraph to require the principal permittee instead of the permittees to conduct one countywide trash study over the 5-year permit to characterize trash sources.

Section VIII – Municipal Inspection of Construction Sites

Paragraph 2 contains conflicting language regarding the sites to be included in the construction inventory. The first part of the paragraph requires those sites that have the potential to impact water quality to be inventoried but later in the paragraph it states that all sites should be included in the inventory. Sites included in the City's annual report include only those sites with grading or sites that pose a threat to water quality. Encroachment permits and building permits such as plumbing or other indoor permits are not included in the inventory.

Recommendation:

Clarify which sites are to be included in the construction category.

Section IX- Municipal Inspections of Industrial Facilities

This section designates the prioritization of industrial facilities and requires certain facilities such as facilities covered under the state's general industrial permit and other categories to be automatically designated as high. High priority sites are inspected

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annually and because of their mandatory designation, there is no provision for reprioritizing these facilities based on the ranking criteria in the DAMP after inspections have been conducted.

Past experience has shown that once a facility has been inspected at least once, there is increased awareness of water quality impacts and facilities will implement BMPs to minimize storm water and nonstorm water discharges. These actions allow the facility to be re-evaluated in accordance with the procedure in the DAMP and redesignated if appropriate. Without allowing for facility redesignation of high priority sites, City resources will be unnecessarily spent on facility inspections that are not warranted. These resources could be better utilized elsewhere to meet other permit requirements.

Attached are the cover sheets of 4 facilities that because of their SIC code and the requirement to be covered under the State's General Industrial Permit are automatically designated High priority. As the latest inspection cover sheets show, their ranking under the DAMP factors would lower the facility's priority designation to Low (less than 15 pts.). However, because of their mandatory High ranking, the facilities must be inspected annually.

Recommendations:

Paragraph 2 & 3. Allow redesignation of mandatory high priority facilities based on the suite of factors in the DAMP used to rank a facility.

Section X – Municipal Inspection of Commercial Facilities

This section contains the requirements for inspection of commercial facilities. In this section eleven new commercial categories are added along with mandatory priority designations. This section requires 10% of all commercial sites to be designated high priority, 40% medium and the remaining sites Low. This requirement is arbitrary and without justification. This provision requires the City to conduct over 50 inspections annually, 250 every two years and 900 during the permit term (50 annually, 200 biennially and 250 once) without any likely measureable improvement in water quality. This effort will require additional City staffing during uncertain economic times.

The DAMP already contains a procedure to assess the priority of commercial sites based on activity type, size, proximity to ASBS water bodies, pollutant potential and nonstorm water discharges. This process should be allowed to continue for prioritization of all commercial sites since it provides a formal procedure for prioritizing and setting inspection frequencies based on the threat to water quality. It also provides for reprioritizing of sites after inspection based on implementation of BMPs and other

factors as noted above. Arbitrarily mandating priority designation and inspection frequencies achieves no purpose other than to unnecessarily expend City resources without a direct benefit to the improvement of water quality.

Recommendations:

Paragraph 1. Provide justification for the additional commercial categories or delete requirement.

Paragraph 2. Allow sites to be prioritized based on the procedure in the DAMP.

Section XII - New Development

This section contains many new requirements that will have a significant impact on how new development/significant redevelopment projects will be approved and the process for approving these projects. More specific information is provided under each of the section headings.

Section A - General Requirements

Successive municipal draft permits have required that new development requirements of the permit be incorporated into permittees' General Plan. Paragraph 4 seems to continue with the same requirements. General Plans are typically revised every 5-10 years. It is an intensive and exhausting process that expends a lot of city resources. Revising other documents such as city policies or the zoning code can achieve the same purpose of incorporating permit requirements into the project review process.

Recommendation:

Revise paragraph 4 to state that other documents besides the General Plan may be revised to incorporate LID principles and policies.

Section B – Water Quality Management Plan (WQMP) for Urban Runoff (For New Development/Significant Redevelopment)

This section identifies the categories of projects that are to be designated as priority projects. The section contains two new categories while lowering the thresholds of other existing categories. This is a concern because no information or justification for these changes is provided.

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Paragraph 2.a states that redevelopment projects that add or replace 5000 sq. ft. of existing impervious surface are designated priority projects and subject to the site design and treatment BMP requirements. The wording in the paragraph should clarify that replacement means where the existing pavement or impermeable surface is removed, replaced and soil exposed. There are many cases in which parking lots or other facilities have their surface grinded down and replaced or overlayed but the soil is not exposed. Under the existing text in the paragraph, these types of projects would be considered priority projects.

The paragraph should also allow discretion in defining what redevelopment projects fall into this category. The City has encountered cases in existing development where improvements were to be made but the nature of the facility was not changed. Such a case was the removal of a vertical tank foundation that exceeded the 5000 sq. threshold with the intent repave the area without any additional uses. Under the exiting permit, these types of projects have been required to provide treatment BMPs for these small areas simply because they removed and replaced 5000 square feet of impervious surface. It makes little sense from a practical point to have this requirement when no other land use improvements are undertaken. The draft permit might cover these cases under the "original purpose of facility" with a slight modification as recommended below.

Recommendations

1. Revise the last part of the first sentence in paragraph 2 as follows: "--, which include the addition or replacement of 5, 000 square feet or more of impervious surface where **the underlying soil is exposed** on a developed site."
2. Revise the last part of the second sentence as follows "---hydraulic capacity, **improvements that do not change the original purpose of the facility**, or emergency --
."

Paragraph 2.b. The subdivision priority category has been revised to include subdivisions with less than 10 units with combined impermeable surfaces of 10,000 sq. ft. The word "subdivision" itself needs to be defined. A strict interpretation relates to the use of a parcel or tract map. Is the intent to cover particular types of projects such as apartments where there could be 10 units or less in a single lot or does it refer to projects with property lines?

The subdivision category change could also require single family residences where two lots are combined into one or two separate lots with combined 10,000 sq. ft. or more of impervious surface to comply with all priority project requirements including LID and

treatment BMPs. No justification has been provided to conclude that single family homes or two lots are significant contributors to water quality problems.

Requiring single family home owners to comply with the requirements of a priority project will add unnecessary costs and expenses and maintenance of treatment BMPs, which is problematic because individual homeowners are not capable of maintaining BMPs.

It is not good policy making to adopt regulations do not have a chance of succeeding. Individual single family homes are not a big threat in comparison to industrial and commercial sites, which are more heavily regulated.

Recommendation:

Revise paragraph 2.b to maintain the previous provision that includes subdivision of 10 units or more as priority projects and delete the requirement that designates less than 10 units as priority projects.

Paragraph 2.c has lowered the threshold of commercial and industrial facilities to 10,000 sq. ft. Again, this change has been made without any justification. In this category, the 10,000 sq. ft. threshold is interpreted to apply to the size of the building and not the total improvements onsite.

Recommendation:

Revise paragraph 2.c to clearly state that the square footage applies to the building area.

Paragraph 2.e appears to use a different threshold for designating priority projects. Most categories use building area (2.c) for designation of priority projects but this category uses total area of development.

Recommendation:

Provide justification for use of land area and not building size or revise paragraph.

Paragraph 2.f. has lowered the threshold from 10,000 sq. ft. to 5,000 sq. ft. for hillside homes. There does not appear to be a justification for this change and clarification needs to be provided on whether the square footage threshold applies to the lot size, total impervious surface onsite or building area. Justification also needs to be provided

on why the hillside home is different from a regular single family development on a site that is less than 25% (definition of hillside). The pollutants generated are essentially the same except you may have higher velocities. What are the pollutants of concern and how are they different from a regular single family home which is not a priority project?

Recommendation:

Provide justification on the lowering of the square footage threshold and the pollutant of concern.

Paragraph 2.i adds streets, roads and highways with 5,000 sq. ft. of paved area as a priority category. Although footnote 42 recognizes that these type of projects may not meet standard WQMP requirements and allows for alternatives, most projects will not be able to meet the LID 5% EIA requirements due to site constraints and economic feasibility.

Recommendation:

Delete this category in its entirety. Most projects will require alternatives.

Paragraph 5.f does not allow infiltration to be used in industrial areas or where light industrial activity occurs. The text can be interpreted to exclude the use of infiltration in nonindustrial projects simply because they are located in an industrial zone.

Recommendation:

Revise paragraph 5.f to clarify that infiltration is allowed in an industrial zone where the facility is not involved with industrial activities or processes such as storage areas or residential and commercial projects.

Section C – Low Impact Development to Control Pollutants In Urban Runoff From New Development/Significant Redevelopment

This section of the permit contains significant new requirements that will be difficult to implement and for all practical purposes impossible to meet for redevelopment and roadway and street projects as noted in B.2.i above. There also seems to be conflicting information or requirements between various paragraphs.

The biggest concern is paragraph C.3 where there is a requirement to limit the project Effective Impervious Areas to 5%. The premise behind this requirement is that impervious surface has a significant role in the degradation of habitat and increases pollutant loads in natural streams and that through the implementation of LID measures the existing hydrological cycle can be maintained to avoid downstream impacts.

While there is little dispute that urban development and associated impervious surface may cause downstream impacts, most studies supporting this conclusion are carried out in undeveloped watersheds where the impact of development on natural streams can be measured. We are not aware of studies carried out in developed watersheds, which is the case in much of northern Orange County where the watersheds have been developed and the streams and channels engineered with concrete and rip rapped for flood control purposes. Applying the 5% impervious cover concept in these watersheds is impractical and not justified since physical degradation of these channels is unlikely.

The City of Orange is mostly built out and about 95% of all approved priority projects involve redevelopment projects. This type of project generally maintains or reduces the hydrologic runoff characteristics of the existing site due to increased landscaping requirements and the use of other pervious surfaces, which is the intent of the LID 5% EIA requirement. These projects will not increase the impacts downstream and are most likely to reduce them. If the intent of the 5% EIA requirement is to mimic predevelopment conditions, projects where the existing hydrological cycle can be maintained as required in Section D should not be subject to the 5% EIA requirement. Otherwise requiring these projects to meet the 5% EIA threshold will be cost prohibitive and will not be achieved in roadway and street projects where the expansion area for these projects is already impervious (sidewalks) and additional acquisition of right-of-way is cost prohibitive.

As another example, consider the case of a strip mall development where a 5000 sq. ft. building will be demolished and rebuilt or expanded by 5000 sq. ft. The proposed regulations will require a change in the drainage pattern of the site and the addition of pervious surfaces. The added costs to regrade, repave, add new pervious surfaces and potentially add or modify the onsite storm drain system would make the project infeasible. Cases such as this are quite frequent in the city and project applicants have made it clear that any improvements required other than the treatment of runoff from the building or proposed applicant improvements that would require significant more work such as regrading of the site would make the project infeasible. In these cases the water quality requirements are viewed as unrealistic and cost prohibitive.

In the cases above, the proposed regulations will deter redevelopment. In the end the City loses an opportunity to redevelop and improve older sections and the environment loses an opportunity for improvement of water quality.

In addition, there is also conflicting information in C.4.b related to the substitution of treatment control BMPs for LID measures. It is stated that treatment BMPs can be substituted for LID measures but there is a requirement to first meet the 5% EIA threshold, which negates what substitution of treatment BMPs for LID. If you meet the 5% EIA requirements you have most likely already met the LID requirement.

There also seems to be a distinction on the meaning of infill and redevelopment projects. For purposes of complying with the water quality requirements of the permit, infill and redevelopment are viewed as the same.

Recommendations:

Paragraph C.3.

1. Limit the 5% Effective Impervious Area (EIA) to undeveloped watersheds only and are not applicable to redevelopment projects or streets and roadways.
2. Footnote 50, 51, 52, and 53 in 3.a- 3.d should reference footnote 49.

Paragraph C.4 – Clarify that treatment measures alone can be used in place of LID measures by revising the paragraph as follows:

1. Delete the 5% EIA requirement as it is conflicting to what the paragraph is trying to achieve.
2. The proof for showing that the post development runoff water quality is equal or better to the existing runoff (item d) is through implementation of treatment BMPs contained in the DAMP.
3. Delete (e) since there is reference to LID measures, which are being substituted for by treatment BMPs.

Section D - Hydrologic Conditions of Concern (Hydromodification)

This section contains the requirements for determining when there are conditions of concern. Again, this section contains conflicting information in relation to LID and hydrological requirements.

Paragraph 2.c. The paragraph states that impervious areas connected to pervious areas that can infiltrate a 2-year storm do not need to be considered in the effective impervious calculation. It is not clear why the pervious areas must be capable of

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infiltrating a 2-year storm. Footnote 43 clearly defines effective impervious areas as those areas that run over pervious surfaces: it does not require infiltration of a 2-year storm. Requiring infiltration equal to a 2-year storm event for all impervious surfaces connected to pervious will not be met and will exceed the project treatment requirements for BMPs specified in Section XII B.4.

As an example of what it means, consider a small area where the site has a 10 minute time of concentration. In the Orange County Hydrology Manual this time corresponds to an intensity of 1.5"/hr.: well above the water quality treatment requirement specified in paragraph B.4. Most projects are unlikely to meet this requirement and all projects where effective impervious areas are calculated in accordance with this paragraph will unnecessarily end up with conditions of concern. The infiltration requirement should apply only to the excess runoff produced from the 2-year storm as stated in footnote 49.

Recommendation:

Revise second sentence in paragraph as follows: "In considering the effective impervious cover, the impervious areas that are directly connected to a storm water conveyance system should be included, and those areas that are connected to pervious areas with a capacity to percolate at least the **excess** runoff from a 2-year storm event, need not be considered."

Paragraph 4. The paragraph states that "hydrologic conditions or concern are not significant, if the post-development hydrograph is no more than 10% greater than the pre-development hydrograph." The characteristics of what needs to be considered in the hydrograph comparison needs to be defined. Besides peak discharges and volume are there other factors? The paragraph also states that where the excess volume from the 2-year storm event cannot be infiltrated, capturing is acceptable as long as the discharge flow rate does not exceed 110% of the predevelopment condition. Detention basins which capture and detain runoff until the peak has passed would qualify as meeting this requirement.

Recommendation:

Clarify which characteristics of hydrograph need to be compared and the use of detention basins to capture and release runoff.

Section E – Alternatives and In-Lieu Programs

This section contains programs that may be used in place of LID, which require further clarification.

Paragraph 3 identifies several types of projects that qualify for a water quality credit system that may be established as alternatives to evapotranspiration, infiltration, LID and the Hydromodification. The credit program is welcomed as a way to offset other projects but it is not clear if this would be a one to one offset or how the program would work. For instance, if an In-fill project (redevelopment private or public) is undertaken, would it offset the requirement for another project on an acre for acre basis. In-fill projects or any other projects listed will themselves have difficulty meeting some of the New Development/Significant Redevelopment LID 5% EIA requirements in the permit. Since these are desirable projects, are they required to meet all requirements in the permit?

Recommendation:

1. Clarify how a water quality credit system might work and if the listed project categories need to comply with all New Development/Significant Redevelopment requirements.

Section F - Approval of WQMPs

Paragraph 1 requires the use of a checklist to ensure that the WQMP incorporates the minimum requirements of the Model WQMP.

Recommendation:

Revise paragraph to state that checklists need not be used if the WQMP template incorporates the requirements of the Model WQMP.

Section J - Preapproved Projects

Paragraph 1 allows approved Water Quality Management Projects to be exempted from the new LID requirements, which include the 5% EIA criteria as well as the hydrologic conditions of concern if the project's final WQMP has been approved.

In previous permits, projects have been exempted from meeting the new permit requirements if they had received entitlement approvals such as tentative or parcel

maps. This provision was intended to assure continuity of projects that received City approvals for land development and did not conflict with approvals given by cities. This is an important provision that allows projects to continue without delay and the need to restart the entitlement process, and possibly redesign the project, to meet new permit requirements.

City approvals included in project review process besides Tentative or Parcel maps include Site Plan or Conditional Use Permits as well as Preliminary WQMP approval. In the Preliminary WQMP approval, the City ensures that all applicable site design and treatment BMPs are incorporated into the WQMP. The Preliminary becomes the Final WQMP with minor text changes unless the project has undergone significant changes during the approval process that affect the approved BMPs. The Preliminary WQMP is where the majority of effort is expended to ensure the project complies with the Model WQMP and new development requirements. This review cycle generally lasts several months and is the basis for City approval of the project WQMP.

Without including Site Plan, Preliminary WQMP or other discretionary city approvals in the provision to exempt previously approved projects, many projects will be forced to restart the entire approval process.

Recommendation:

Exempt projects that have received Tentative or Parcel Map or other discretionary city approvals such as Site Plan, Conditional Use Permits, Preliminary or Final WQMP approval from the new development/significant redevelopment requirements.

Section XIV – Municipal Facilities/Activities

Paragraph 3.b requires permittees to inspect flood control and storm water conveyance systems on an annual basis. While flood control channels are inspected annually, storm drains are not. In previous permits, large storm drains were inspected to identify illegal connections. This requirement was removed after it was determined that illegal connections were not a concern. The paragraph should be revised to clarify that storm water conveyance systems do not mean storm drains.

Recommendation:

Delete storm water conveyance systems and revise to "Open Flood Control Channels."

Paragraph 3.d requires permittees to inspect their sewage collection system on an annual basis. Cities that own collection systems in California are subject to WDR Order 2006-0003. That order requires municipalities to develop a maintenance plan and schedule. It does not require annual inspection. The City has a five-year maintenance cycle where some collection lines are inspected annually and others can take up to five years. The sewer inspection provision should be consistent with the state WDR requirements.

Recommendation:

Delete reference to sewage collection and reference state WDR permit as noted in paragraph 14.

Paragraph 5.d. requires that the LIP be revised within six months of permit adoption to incorporate an Integrated Pest Management Program (IPM). Incorporation of a complete IPM will be completed after the UC Cooperative Extension completes the Model Integrated Pest Management Program. It is not known when this document will be completed and the City has not had a chance to review any drafts. Six months may not be sufficient and the timeline should be to allow for six months after the completion of the Model IPM by the UC Cooperative Extension. The City currently follows the Model Integrated Pest Management, Pesticides and Fertilizer Guidelines of section 5.5 of the DAMP as noted in 5.b.

Recommendation:

Revise paragraph to allow for six months to revise LIP after the Model IPM has been completed by the UC Cooperative Extension.

Section XVI - Training

ROWD

Training commitments submitted in the Report of Waste Discharge (ROWD) were meant to ensure that individuals were properly trained. These training commitments can be accomplished through revision of existing training modules developed by the principal permittee (County of Orange) for the various program elements. Cities can in turn modify these modules or develop their own to provide the necessary training.

Certifications

The City fully supports having trained individuals to carry out the requirements of the permit. However, the proposed Training section contains provisions that go well beyond

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having appropriate training by requiring testing and certifications such as Certificates of Completion to document training. This creates an additional and unnecessary expense to the permittees.

Public agencies by law approve class specifications and training requirements. By requiring certifications the permit infringes on the rights of cities to set employee training requirements. In addition, changes to class specifications required by proposed certifications must be negotiated with appropriate bargaining units and approved by the city council. The permit should simply require individuals to be properly trained and leave it to the permittees to provide the necessary training and ensure competency in carrying out work assignments.

Other Provisions

Paragraphs 1 and 3 require public works employees and maintenance crews to have expertise and competence in carrying out their assignments. This requirement is over-reaching. Not all public works employees conduct work that affects water quality. There are many that have office jobs and do not need to be trained beyond providing them with information about water quality through newsletters, brochures and internal storm water presentations.

Maintenance crews are trained on minimizing water discharges and nonstorm water discharges through internal presentations and the Model Maintenance Procedure fact sheets and are made aware of federal (CWA) and state (Water Code) water quality requirements. This training should suffice for these employees without the need to show expertise and competence in water quality. Some employees may have difficulty taking tests and this should not be a requirement to determine whether they can perform their jobs. Supervisors are capable of providing the guidance needed.

The section also requires the principal permittee to provide training on an annual basis for specific individuals involved in implementing the requirements of the permit and for permittees to attend a minimum of three sessions during the term of the permit. The City believes attending two training sessions is sufficient.

In addition, requiring annual training for the sake of permit compliance seems unnecessary unless there is a change in laws, permit requirements or other factors. Repeating the same material year after year serves little purpose other than to use up time and valuable resources.

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Recommendations:

Paragraph 1. Clarify that public works employees refers to those individuals that actually carry out the requirements of the permit and that maintenance crews need to be trained only on water quality requirements and Model Maintenance procedures.

Paragraph 3. As noted above, requiring testing and proof of completion such as certificates infringes on the rights of cities to set class specification requirements. Revise the paragraph as follows: "The training modules for each category of trainees (managers, inspectors, planners, contractors, public works crews, etc.) should define the required competencies.

Paragraph 4. Delete the requirement to attend 3 training sessions and to determine competency and testing.

1. Revise third sentence as follows: " Each permittee shall attend at least **two** of these training sessions during the term of this permit."

2. Delete testing requirement.

Paragraph 6. Consistent with the comments above requiring testing and competency, revise the last sentence as follows: "---, the permittees shall require evidence that contract staff have received an adequate level of training."

Paragraph 8. 60 days may not be sufficient to be trained and implement the requirements of the permit. The training time depends on the assignment to be carried out and involves more than simply viewing training modules. There may be field inspections and written documents to be reviewed (DAMP, LIP, codes, etc.). Understanding these documents will require more than 60 days. Program managers may require a year or more, other staff less.

Recommendation:

Allow a minimum of 120 days for inspectors and up to 1 yr. for program managers. A varying scale of 6 months to a year can be used for plan checkers and environmental reviewers.

Industrial Inspection Cover Sheets



CITY OF ORANGE
National Pollution Discharge Elimination System (NPDES)

INDUSTRIAL - COMMERCIAL FACILITY INSPECTION

Public Works Department
637 W. Struck Ave., Orange CA 92867
(714) 532-6480

Date: 8/11/08 Time: 9:30 am Inspector(s): R. Esparza

☐ Initial Inspection ☒ Routine Inspection ☐ Follow-up Inspection ☐ Response to Complaint

I. GENERAL INFORMATION

Facility Name: Furniture Traditions Site Address: 1450 W. Collins
Contact Name: Francisco Mesinas Contact Phone: 538-2088
SIC Code: 5712 SIC Code Description: Furniture Stores
Primary Business Activity: Wood Furniture Manufacturing
Facility Type: ☒ Industrial ☐ Commercial Priority Status: ☒ High ☐ Medium ☐ Low
Is the facility covered under a storm water permit? ☐ Individual NPDES ☒ General NPDES WDID# 015484
Does the facility have a Storm Water Pollution Prevention Plan (SWPPP) Onsite? ☒ Yes, dated: 10/02 ☐ No ☐ N/A
City of Orange Business License Number: 53618

II. ACTIVITIES / BEST MANAGEMENT PRACTICES (BMP) ASSESSMENT

General Facility Description:

2 Large Industrial buildings with indoor work processing areas. One building used for storage and one for wood furniture manufacturing

Nearby conveyances and/or visible off-site discharge points:

5 drains are located on the property, all lead to O.C. flood channel

Outdoor walk through (note activities and any BMPs in use):

Dust vacuum used to clean whole facility. Areas along the west fence are done every other day as well as areas with the most sawdust
Trucks are serviced by outside company every 3 months.
Lumber stored under cover with curtains to prevent exposure to storm water.

Indoor walk through (note activities and any BMPs in use):

Sawdust is swept by hand regularly
Good housekeeping,
Operations have slowed to 4 days a week (Fridays off)

III. PRIORITIZATION VERIFICATION

7 - LOW BUT
Keep High

Industrial/Commercial

Type of Activity - Percent of activities outdoors and uncovered: ☒ <25% ☐ 25-50% ☐ 50-75% ☐ >75%

Discharge Potential - Overall implementation of BMPs: ☒ Fully Implemented ☐ Partially Implemented ☐ None or Unknown

Non-stormwater Discharges: ☒ None observed / no evidence of / no sources noted

☒ Sources observed, but BMPs in place

☐ Sources observed, no BMPs in place, but no discharge

☐ Observed discharges / evidence of discharges / no BMPs

Facility size - Approximate size of impervious area: ☐ <5,000 sq. ft. ☒ 5,000-100,000 sq. ft. ☐ >100,000 sq. ft.

Material used - Amount of raw material kept indoors or properly covered outdoors: ☒ All ☐ Most ☐ Some ☐ Few / none

Waste Generated: ☐ N/A ☒ Not generated or disposed of properly ☐ Generated and not disposed properly



CITY OF ORANGE
National Pollution Discharge Elimination System (NPDES)

Public Works Department
637 W. Struck Ave., Orange CA 92867
(714) 532-6480

Date: 8/26/08 Time: 10⁰⁰ am Inspector(s): T. DUNN
☐ Initial Inspection ☒ Routine Inspection ☐ Follow-up Inspection ☐ Response to Complaint

I. GENERAL INFORMATION

Facility Name: USE REDDAWAY Site Address: 2200 N BATAVIA ST
Contact Name: BOB BOHI Contact Phone: 637-9745
SIC Code: 4212 SIC Code Description: LOCAL TRUCKING W/O STORAGE
Primary Business Activity: TRUCKING / MATERIAL TRANSPORTATION
Facility Type: ☒ Industrial ☐ Commercial Priority Status: ☒ High ☐ Medium ☐ Low
Is the facility covered under a storm water permit? ☐ Individual NPDES ☐ General NPDES WDID# _____
Does the facility have a Storm Water Pollution Prevention Plan (SWPPP) Onsite? ☐ Yes, dated: _____ ☐ No ☐ N/A
City of Orange Business License Number: 124908

II. ACTIVITIES / BEST MANAGEMENT PRACTICES (BMP) ASSESSMENT

General Facility Description:
OFFICES / SHOP BLDGS, LOADING DOCK & OPEN YARD FOR VEHICLES
Nearby conveyances and/or visible off-site discharge points:
PROP SLOPES SOUTHEAST TO MAIN ENTRY DRIVE
Outdoor walk through (note activities and any BMPs in use):
CONTAINMENT SHED @ FUEL AREA (NEW/USED FLUIDS)
ABSORBENT AVAILABLE
TRASH CONTAINERS W/ LIDS
VEHICLE MAINT / CLEANING ELSEWHERE OR ON-SITE BY OTHERS
Indoor walk through (note activities and any BMPs in use):
MECH. SHOP CLOSED - MOST MAINT OFF-SITE
WEEKLY SAFETY MTGS / SAFETY COMMITTEE - MONTHLY

III. PRIORITIZATION VERIFICATION

TOTAL LOW HI-PRI PER RWQCB

Industrial/Commercial

Type of Activity - Percent of activities outdoors and uncovered: ☐ <25% ☒ 25-50% ☐ 50-75% ☐ >75%
Discharge Potential - Overall implementation of BMPs: ☒ Fully Implemented ☐ Partially Implemented ☐ None or Unknown
Non-stormwater Discharges: ☐ None observed / no evidence of / no sources noted
☒ Sources observed, but BMPs in place
☐ Sources observed, no BMPs in place, but no discharge
☐ Observed discharges / evidence of discharges / no BMPs
Facility size - Approximate size of impervious area: ☐ <5,000 sq. ft. ☐ 5,000-100,000 sq. ft. ☒ >100,000 sq. ft.
Material used - Amount of raw material kept indoors or properly covered outdoors: ☒ All ☐ Most ☐ Some ☐ Few / none
Waste Generated: ☐ N/A ☒ Not generated or disposed of properly ☐ Generated and not disposed of properly



INDUSTRIAL - COMMERCIAL FACILITY INSPECTION

CITY OF ORANGE

National Pollution Discharge Elimination System (NPDES)

Public Works Department

637 W. Struck Ave., Orange CA 92867

(714) 532-6480

Date: 8/27/08

Time: 9:30am

Inspector(s): R. Esparza

☐ Initial Inspection

☒ Routine Inspection

☐ Follow-up Inspection

☐ Response to Complaint

I. GENERAL INFORMATION

Facility Name: ABF Freight Site Address: 1601 N. Batavia
 Contact Name: Jerry Wright Contact Phone: 974-2485
 SIC Code: 4213 SIC Code Description: Trucking
 Primary Business Activity: Trucking & Freight Transportation
 Facility Type: ☒ Industrial ☐ Commercial Priority Status: ☒ High ☐ Medium ☐ Low
 Is the facility covered under a storm water permit? ☐ Individual NPDES ☒ General NPDES WDID# Waiting for WDID
 Does the facility have a Storm Water Pollution Prevention Plan (SWPPP) Onsite? ☒ Yes, dated: Old SWPPP ☐ No ☐ N/A
 City of Orange Business License Number: 110767 For Former Co.

II. ACTIVITIES / BEST MANAGEMENT PRACTICES (BMP) ASSESSMENT

General Facility Description:

Large building with covered loading docks for Freight Trucks.

Nearby conveyances and/or visible off-site discharge points:

Curbed concrete swales on the north and south sides of the property divert stormwater to Batavia.

Outdoor walk through (note activities and any BMPs in use):

Sweeping of outdoor areas is done weekly by landscaping company.
Outside areas are checked daily for problems. Forklifts are serviced onsite
by outside company. Trucks are serviced at facility in Pico Rivera
Vehicle & Trailer storage - Areas are clean

Indoor walk through (note activities and any BMPs in use):

Spill Kits clearly labeled and available
Biannual spill response training for employees
Loading and unloading of vehicles
Extremely clean loading dock

III. PRIORITIZATION VERIFICATION

7 Low BUT KEEP HIGH

Industrial/Commercial

Type of Activity - Percent of activities outdoors and uncovered: ☒ <25% ☐ 25-50% ☐ 50-75% ☐ >75%

Discharge Potential - Overall implementation of BMPs: ☒ Fully Implemented ☐ Partially Implemented ☐ None or Unknown

Non-stormwater Discharges: ☒ None observed / no evidence of / no sources noted

☐ Sources observed, but BMPs in place

☐ Sources observed, no BMPs in place, but no discharge

☐ Observed discharges / evidence of discharges / no BMPs

Facility size - Approximate size of impervious area: ☐ <5,000 sq. ft. ☐ 5,000-100,000 sq. ft. ☒ >100,000 sq. ft.

Material used - Amount of raw material kept indoors or properly covered outdoors: ☒ All ☐ Most ☐ Some ☐ Few / none

Waste Generated: ☐ N/A ☒ Not generated or disposed of properly ☐ Generated and not disposed properly



INDUSTRIAL - COMMERCIAL FACILITY INSPECTION

CITY OF ORANGE

National Pollution Discharge Elimination System (NPDES)

Public Works Department

637 W. Struck Ave., Orange CA 92867

(714) 532-6480

Date: 9/9/08

Time: 9:00 am

Inspector(s): T. DUNN

☐ Initial Inspection

☒ Routine Inspection

☐ Follow-up Inspection

☐ Response to Complaint

I. GENERAL INFORMATION

Facility Name: UNIVERSAL CYL. EXCHANGE Site Address: 692 N CYPRESS ST # B

Contact Name: BRIAN OGIER

Contact Phone: 714 774-1036

SIC Code: 3593

SIC Code Description: FLUID POWER CYLINDERS & ACTUATORS

Primary Business Activity: PROPANE CYLINDER PROCESSING

Facility Type: ☒ Industrial ☐ Commercial

Priority Status: ☒ High ☐ Medium ☐ Low

Is the facility covered under a storm water permit? ☐ Individual NPDES ☐ General NPDES WDID# _____

Does the facility have a Storm Water Pollution Prevention Plan (SWPPP) Onsite? ☐ Yes, dated: _____ ☐ No ☐ N/A

City of Orange Business License Number: 105087

II. ACTIVITIES / BEST MANAGEMENT PRACTICES (BMP) ASSESSMENT

General Facility Description:

(2) UNIT BLDG OF OFFICES, SHOP OPEN YARD ON WEST SIDE

Nearby conveyances and/or visible off-site discharge points:

YARD SLOPES NORTH TO SWALE LEADING EAST TO STREET
NORTHWEST AREA PONDS, THEN EVAPORATES

Outdoor walk through (note activities and any BMPs in use):

YARD IS CLEAN - SWEEP DAILY - ALL IS PAVED
NORTH SIDE SWALE CLEANED REGULARLY
STORAGE IN YARD KEPT OFF GROUND
MATERIAL RECYCLING BY OTHERS
CLEANING OF CYLINDERS IN DRUMS / WATER CONTAINED

Indoor walk through (note activities and any BMPs in use):

SHOP AREA APPEARS CLEAN - SWEEP REGULARLY
WEEKLY MTO W/ STAFF

III. PRIORITIZATION VERIFICATION

TOTAL (8) LOWER TO MED - PRI 10

Industrial/Commercial

Type of Activity - Percent of activities outdoors and uncovered: ☐ <25% ☐ 25-50% ☒ 50-75% ☐ >75%

Discharge Potential - Overall implementation of BMPs: ☒ Fully Implemented ☐ Partially Implemented ☐ None or Unknown

Non-stormwater Discharges:

- ☒ None observed / no evidence of / no sources noted
☒ Sources observed, but BMPs in place
☐ Sources observed, no BMPs in place, but no discharge
☐ Observed discharges / evidence of discharges / no BMPs

Facility size - Approximate size of impervious area: ☐ <5,000 sq. ft. ☒ 5,000-100,000 sq. ft. ☐ >100,000 sq. ft.

Material used - Amount of raw material kept indoors or properly covered outdoors: ☐ All ☒ Most ☐ Some ☐ Few / none

Waste Generated: ☐ N/A ☒ Not generated or disposed of properly ☐ Generated and not disposed properly